



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

January 14, 2021

BY CM/ECF

The Honorable Paul G. Gardephe
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: United States v. Omar Amanat
S8 15 Cr. 536 (PGG)

Dear Judge Gardephe:

Pursuant to the Court's December 29, 2020 Order, the Government's responses to defendant Omar Amanat's recent Rule 33 motions are due on January 19, 2021. One of the defendant's motions claims that his ex-wife discovered Blackberry devices that contained the emails that the Government showed the defendant had fabricated during the 2017 trial. (Dkt. 1114). In order for the Government to test the veracity of these claims and to properly respond to this motion, the Government has requested the following information from the defendant: (1) the Blackberry devices; (2) the complete Cellbrite reports for the Blackberries analyzed by Cornerstone Discovery; (3) the native versions of all emails purportedly discovered on the Blackberries, including those reflected on GX 3553 and GX 3549; (4) a list of all documents and information provided to John Carrouthers; and (5) an affidavit from Mr. Amanat's ex-wife that details, among other things, (a) her identity, (b) the specifics of her alleged discovery of the Blackberries, and (c) the chain of custody of the Blackberries (collectively, the "Information"). The Government has conferred with defense counsel, who has agreed to provide the Information. The Government and defense counsel jointly request that the Government's response to this motion be due three weeks after the defendant provides the Information, and that the defendant's reply be due ten days thereafter.

Respectfully submitted,

AUDREY STRAUSS
Acting United States Attorney

By: /s/
Joshua A. Naftalis
Andrea M. Griswold
Daniel M. Tracer
Assistant United States Attorneys
(212) 637-2310/1205/2329

cc: Defense Counsel